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15 *Attorneys for Defendant Google LLC*

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 CHASOM BROWN, WILLIAM BYATT,  
20 JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
21 individually and on behalf of all similarly  
situated,

22 Plaintiffs,

23 v.

24 GOOGLE LLC,  
25 Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
JOINT LETTER BRIEF RE: DISPUTE  
P16**

Referral: Hon. Susan van Keulen, USMJ

## [PROPOSED] ORDER

Before the Court is Defendant Google LLC’s Administrative Motion to Seal portions of the parties’ Joint Letter Brief re: Dispute P16 (the “Motion”). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document Sought to Be Sealed	Party Claiming Confidentiality	Court's Ruling on Motions to Seal	Basis for Sealing Portion of Document
Joint Letter Brief re: Dispute P16	Google	GRANTED as to redacted portions at page 4 at lines 19, 21, 25-26, 27-28; page 5 at lines 4-5, 9-14, 22-23; page 7 at lines 23-25, 26-28; page 8 at lines 27-28; page 9 at lines 1-2, 3, 5-7, 8, 9, 10, 11, 12, 13-14, 22-23, 25; and page 10 at line 1.	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal identifiers and various data logs maintained by Google, as well as Google's internal practices with regard to the X-Client-Data Header and its proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

**SO ORDERED.**

DATED:

**HON. SUSAN VAN KEULEN**  
United States Magistrate Judge